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June 15, 2025

**By ECF**

Hon. Margaret M. Garnett  
U.S. District Judge  
U.S. Courthouse  
40 Foley Square  
New York, N.Y. 10007

Re: U.S. v. Luigi Mangione  
25 Cr. 176 (MMG)

Dear Judge Garnett:

This letter is respectfully submitted on behalf of the defendant Luigi Mangione, to request an extension of time to file motions related to the constitutionality of the death penalty and the Government's decision to seek the death penalty in this case.

Since the arraignment of Mr. Mangione on April 25, defense counsel have been working diligently to research and draft appropriate motions in this case and in the parallel case filed against Mr. Mangione in New York County, while also reviewing discovery and working on the mitigation investigation. Additionally, all defense counsel involved in the case have commitments to other cases that must be met. Given the complex nature of the issues in this case and the other ongoing responsibilities involved in preparing this case for trial, defense counsel need additional time to prepare the motions addressed to the death penalty. If acceptable to the Court, we propose that the Defendant's motions addressed to the death penalty be filed on or before September 19, with the Government's response due by October 31 and the Defendant's reply due on November 14. We further propose that the schedule for additional pretrial motions be addressed at the next pretrial conference currently scheduled for December 5, 2025.

We have discussed this matter with counsel for the Government, and although they initially proposed a shorter extension of the motion deadline, upon reflection the parties determined that the requested extension works best for the schedules of all counsel.

Thank you in advance for your consideration of this request.

Respectfully submitted,  
*avraham moskowitz*  
Avraham C. Moskowitz

cc: All counsel of record (by ECF)